

1 Chief Judge Ricardo S. Martinez
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10 UNITED STATES DISTRICT COURT FOR THE
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE
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15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.
18
19 HUAWEI DEVICE CO., LTD., and
20 HUAWEI DEVICE USA, INC.,
21
22 Defendants.
23
24

NO. CR19-0010RSM

**CORPORATE DISCLOSURE
STATEMENT REGARDING VICTIM**

25 The United States of America, by and through, Tessa M. Gorman, First Assistant
26 United States Attorney for the Western District of Washington (Acting Under Authority
27 Conferred by 28 U.S.C. § 515), and Todd Greenberg, Thomas Woods, and Siddharth
28 Velamoor, Assistant United States Attorneys for said District, hereby file the following
statement pursuant to Federal Rule of Criminal Procedure 12.4(a)(2). This case involves
an organization victim, *i.e.*, T-Mobile. On May 2, 2019, T-Mobile advised the
government of the following:

25 T-Mobile USA, Inc., a Delaware corporation, is a wholly-owned subsidiary
26 of T-Mobile US, Inc., a Delaware corporation. T-Mobile US, Inc.
27 (NASDAQ: TMUS) is a publicly-traded company listed on the NASDAQ
28 Global Select Market of NASDAQ Stock Market LLC (“NASDAQ”).
Deutsche Telekom Holding B.V., a limited liability company (besloten
vennootschap met beperkte aansprakelijkheidraies) organized and existing

1 under the laws of the Netherlands (“DT B.V.”), owns more than 10% of the
 2 shares of T-Mobile US, Inc. DT B.V. is a direct wholly-owned subsidiary
 3 of T-Mobile Global Holding GmbH, a Gesellschaft mit beschränkter
 4 Haftung organized and existing under the laws of the Federal Republic of
 5 Germany (“Holding”). Holding, is in turn a direct wholly-owned
 6 subsidiary of T-Mobile Global Zwischenholding GmbH, a Gesellschaft mit
 7 beschränkter Haftung organized and existing under the laws of the Federal
 8 Republic of Germany (“Global”). Global is a direct wholly-owned
 9 subsidiary of Deutsche Telekom AG, an Aktiengesellschaft organized and
 10 existing under the laws of the Federal Republic of Germany (“Deutsche
 11 Telekom”). The principal trading market for Deutsche Telekom’s ordinary
 12 shares is the trading platform “Xetra” of Deutsche Börse AG. Deutsche
 13 Telekom’s ordinary shares also trade on the Frankfurt, Berlin, Düsseldorf,
 14 Hamburg, Hannover, München and Stuttgart stock exchanges in Germany.
 15 Deutsche Telekom’s American Depository Shares (“ADSs”), each
 16 representing one ordinary share, trade on the OTC market’s highest tier,
 17 OTCQX International Premier (ticker symbol: “DTEGY”).
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19 DATED this 3rd day of May, 2019.

20 Respectfully submitted,

21 TESSA M. GORMAN
 22 First Assistant United States Attorney
 23 (Acting Under Authority Conferred by
 24 28 U.S.C. § 515)

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 27
 28 *s/Todd Greenberg*
 29 TODD GREENBERG
 30 THOMAS WOODS
 31 SIDDHARTH VELAMOOR
 32 Assistant United States Attorneys
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CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2019 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s).

s/Jenny Fingles
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